

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (MAS) (RLS)

THIS DOCUMENT RELATES TO ALL CASES

CERTIFICATION OF P. LEIGH O'DELL, ESQ.

P. Leigh O'Dell, ESQ., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs. I submit this Certification based on personal knowledge in support of the Motion of Plaintiffs' Steering Committee's to Exclude the Opinions of Matthew S. Sanchez, Ph.D., Ann G. Wylie, Ph.D., and Shu-Shun Su, Ph.D.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Second Supplemental Expert Report of William E. Longo, Ph.D. and Mark W. Rigler, Ph.D., dated February 1, 2019.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Fourth Supplemental Expert Report of William E. Longo, Ph.D., dated April 29, 2024.

4. Attached hereto as Exhibit 3 is a true and correct copy of the Third Supplemental Expert Report of William E. Longo, dated November 17, 2023.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Expert Report of David A. Kessler, M.D. (MDL), dated November 15, 2023.

6. Attached hereto as Exhibit 5 is a true and correct copy of the Amended Rule 26 Expert Report of William Sage, MD, JD (MDL), dated November 15, 2023.

7. Attached hereto as Exhibit 6 is a true and correct copy of the Expert Report of Shu-Chun Su (MDL), dated May 21, 2024.

8. Attached hereto as Exhibit 7 is a true and correct copy of the transcript of the Deposition of Shu-Chun Su, dated July 11, 2024.

9. Attached hereto as Exhibit 8 is a true and correct copy of the transcript of the Deposition of Shu-Chun Su, dated July 18, 2024.

10. Attached hereto as Exhibit 9 is a true and correct copy of the “The Dispersion Staining Technique and Its Application to Measuring Refractive Indices of Non-opaque Materials, with Emphasis on Asbestos Analysis,” Shu-Chun Su, Ph.D. *The Microscope* Vol. 69:2, pp 51-69 (2022).

11. Attached hereto as Exhibit 10 is a true and correct copy of the Expert Report of Matthew S. Sanchez, Ph.D., dated March 26, 2024.

12. Attached hereto as Exhibit 11 is a true and correct copy of the Curriculum Vitae of Expert Matthew S. Sanchez, Ph.D.

13. Attached hereto as Exhibit 12 is a true and correct copy of the transcript of the Deposition of Matthew S. Sanchez, Ph.D. (MDL), dated June 25, 2024.

14. Attached hereto as Exhibit 13 is a true and correct copy of Exhibit 28 to the deposition of John Hopkins, dated November 5, 2018.

15. Attached hereto as Exhibit 14 is a true and correct copy of OSHA ID 191, entitled, "*Polarized Light Microscopy of Asbestos*," published October 1992, revised February 1995.

16. Attached hereto as Exhibit 15 is a true and correct copy of the EPA EPA600/R-93/116 Test Method entitled, "Method for the Determination of Asbestos in Bulk Building Materials," dated July 1993.

17. Attached hereto as Exhibit 16 is a true and correct copy of International Standard ISO 22262-1, dated July 1, 2012.

18. Attached hereto as Exhibit 17 is a true and correct copy of Matthew S. Sanchez, Ph.D.'s Review of the Expert Report of Dr. David A. Kessler (Balderrama, Carl), dated April 1, 2024.

19. Attached hereto as Exhibit 18 is a true and correct copy of Matthew S. Sanchez, Ph.D.'s Review of the Expert Report of Dr. William Sage, MD (Balderrama, Carl), dated April 1, 2024.

20. Attached hereto as Exhibit 19 is a true and correct copy of the Expert Report of Ann G. Wylie, dated May 3, 2024.

21. Attached hereto as Exhibit 20 is a true and correct copy of the Expert Report of Ann G. Wylie, Ph.D. For General Causation (MDL) dated February 25, 2019.

22. Attached hereto as Exhibit 21 is a true and correct copy of the transcript of the Deposition of Ann G. Wylie, Ph.D. (MDL), dated June 24, 2024.

23. Attached hereto as Exhibit 22 is a true and correct copy of the transcript of the Deposition of Ann G. Wylie, Ph.D. (MDL), dated March 13, 2019.

24. Attached hereto as Exhibit 23 is a true and correct copy of a draft of the “Pittsburg Work Plan” PowerPoint of Shu-Chun Su, Ph.D., dated June 7, 2024.

25. Attached hereto as Exhibit 24 is a true and correct copy of the National Institute of Standards & Technology Certificate entitled, “Standard Reference Material 1866b, Common Commercial Asbestos (NIST SRM 1866b), dated January 9, 2007.

26. Attached hereto as Exhibit 25 is a true and correct copy of the Supplemental Expert Report of William A. Longo, Ph.D., dated October 9, 2023.

27. Attached hereto as Exhibit 26 is a true and correct copy of the USGS Open-File Report 2006-1362 entitled, “Mineralogy and Morphology of Amphiboles Observed in Soils and Rocks in El Dorado Hills, California.”

28. Attached hereto as Exhibit 27 is a true and correct copy of Exhibit 28 to the May 3, 2024, Deposition of William A. Longo, Ph.D., entitled, “Appendices

to White Paper: IWGACP Scientific Opinions on Testing methods for Asbestos in Cosmetic Talc Products Containing Talc,” dated December 2021.

29. Attached hereto as Exhibit 28 is a true and correct copy of the U.S. Environmental Protection Agency’s Response to the November 2005 National Stone, Sand & Gravel Association Report, prepared by the R.J. Lee Group, Inc. entitled “Evaluation of EPA’s Analytical Data from the El Dorado Hills Asbestos Evaluation Project”, dated April 20, 2006.

30. Attached hereto as Exhibit 29 is a true and correct copy of a Luzenac Group document entitled “Visit of JP Grange to Vermont operations,” Bates Number IMERYS 145198.

31. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

P. LEIGH O’DELL

Dated: July 23, 2024